Seagull Pte Ltd

SUSTAINABILITY REPORT

Seagull

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Message from Management

In 2023, Seagull Pte Ltd opted for a more strategic approach to Sustainable Business Development. Our organization has long been engaged with the local community, and our concern for nature, especially the maritime environment, has grown significantly over the years. We recognize that even small and medium-sized companies like ours play a crucial role in sustainability.

To advance our efforts, we identified the need for a structured approach to provide our key stakeholders with sustainability information that is accurate, reliable, and comparable over time and with other companies in the industry. To achieve this, we have established valuable partnerships and collaborations to help us understand reporting frameworks and standards, comply with new laws and regulations, and manage emission accounting. Additionally, we have implemented new tools, processes, and governance structures to ensure continuous improvement and drive our sustainability agenda. Insights from customers, suppliers, and industry associations have been invaluable in understanding their views and meeting their information needs.

We credit this achievement to the hard work of our sustainability task force, who have willingly taken on the additional responsibility to advance our sustainability journey. This marks the beginning of our sustainability journey. We are confident that integrating Environmental, Social, and Governance (ESG) topics into our overall business strategy and goals is essential for creating sustainable value.
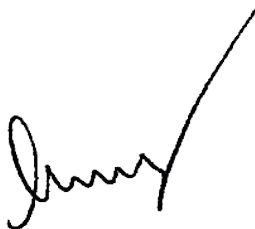
HIGHLIGHTS OF THE REPORT

◦   Alignment with international reporting standards and protocols.
◦   Established policies, processes, and a support network.
◦   Phasing in of rooftop solar photovoltaic (PV) system.
◦   Investments in electric vehicles (EVs), supportive policies for renewing company-owned vehicles at the end of their Certificate of Entitlement (COE) period, and incentives for private EV ownership are underway, alongside the existing EV chargers for employees and company cars, which are soon expected to transition from grid power to solar power with our solar photovoltaic (PV) system installation.
◦   Phasing out of old air conditioning equipment with R32 type air conditioners.

We are proud to have taken these initial steps toward a better future. We are committed to adopting more sustainable business practices and look forward to continuing to share our impact and achievements in the years to come.

Dr. Murugesan Sethu Ph.D.
Sustainability Officer & CTO

Mr. M S Maniam Babu
Founder & CEO

Introduction

This report summarizes the approach, methodology, and outcome of Seagull Pte Ltd's (Seagull's) Sustainability Strategy.

The purpose of this report is to share insights about Seagull's sustainability strategy with interested stakeholders, both internal and external.

- About the organization, its context, and industry
- Strategy overview
- Methodology applied
- Approach to sustainability accounting
- Alignment with frameworks, and standards
- Materiality Assessment process
- Stakeholder Engagement
- Impact, Risk, and Opportunity Assessment
- Overview of Environmental, Social, and Governance topics and metrics
- Summary of ESG performance and initiatives

The focus of this report is on the foundation that has been laid for future sustainability strategy and reporting. A full-year report will be created for fiscal year 2024.

About the organization

Business snapshot

Founded in 2003, Seagull is a family-owned company and a prominent player in the ship repair industry in Singapore. Serving as a comprehensive one-stop shop for all ship repair services, we operate with a distinctive approach, conducting nearly all ship repair activities in-house on a 24x7 basis.

VISION STATEMENT

"Be the One-Stop Marine and Offshore Engineering Company by Offering Total Solutions for Marine Repair and Offshore Fabrication to Our Clients through Safety, Quality and On Time Delivery"

Over **20 years** of industry expertise

Winner of **TAFEP** award, 2023

Serving **300+** global clients

83% client retention rate

Every service line presents its own set of sustainability related challenges and opportunities. Aligning efforts to mitigate environmental impact while maximising business value is integral to ensuring the resilience of our strategy and operations for the future.

Service Lines

2022 Revenue %

- 20% — Fabrication
- 6% — Machine Shop
- 74% — Anchorage

Legend:
- Anchorage
- Fabrication
- Machine Shop

About the organization

Business snapshot

PRODUCTS AND SERVICES

- All types of afloat and voyage ship repairs
- Structural fabrications for Offshore, subsea and windfarm
- Comprehensive Machining Services
- Servicing mechanical and electrical machinery
- Supply of skilled manpower resources
- Offshore/Windfarm project mobilisation/demobilisation (sea fastening) services
- Maritime engineering and management services
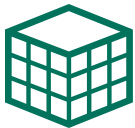
INFRASTRUCTURE

Headquartered in Singapore, Seagull boasts best-in-class fabrication and machining facilities. Our infrastructure includes a 200,000-square-foot fabrication yard and a 16,000-square-foot machine shop.

MARKET PRESENCE

With more than 300 clients from around the world, Seagull has regional footprints in the United Kingdom, Netherlands, Germany, Norway, Cyprus, France, Dubai, Singapore, Thailand, Malaysia, China, United States of America, and India.

QUALITY MANAGEMENT

We have a robust QEHS management system that is aligned with ISO standards. This system ensures that quality, environmental, health, and safety aspects are meticulously integrated into the operations, guaranteeing top-notch service delivery.

OUR PEOPLE

We take care of our people. With well-established health and safety measures for employees, we had 0% Health & Safety issues, 95% Employee Retention and 30% Employee Growth: 30% as of Year 2023.

We also provide a 3-month long training for our workers to ensure role-fitment and diversification of skills. The program also equips employees to handle variety of responsibilities, enhancing their flexibility and ability to meet customers' needs.

About the organization

Industry and sustainability context

Customers are increasingly requesting data for GHG emissions due to their sustainability commitments and mandatory reporting of Scope 3 emissions. The International Maritime Organization (IMO) has defined a comprehensive decarbonization strategy for international shipping, leading to new industry regulations overseen by the Maritime & Port Authority of Singapore (MPA) and equivalent authorities in other markets.

We foresee an increasing demand for services deriving from mandatory carbon reduction targets for new ships (Energy Efficiency Design Index (EEDI), the Energy Efficiency Existing Ships Index (EEXI) for existing ships and the Ship Energy Efficiency Management Plan (SEEMP). These new mandatory KPIs will force shipping companies, some of them being our top-tier customers, to improve maintenance and remove inefficiencies.

The increasing demand for green services, driven by electric vessels and new decarbonization targets set for the shipping industry, is likely to spur the need for new services:

- **Circularity** - a focus for shipowners that will impact repairing companies to maximize the life of ships, which may lead to demand for lifecycle extension and repurposing.

- **Efficiency -** of ships to reduce carbon emissions is likely to lead to a requirement of maintenance and solutions to its clients and promote measurable performance improvements in vessels through green modifications and/or services.

- **Service types** - new low-carbon ships may require other kinds of services and skills.

Seagull Sustainability Strategy

Seagull is dedicated to integrating sustainability into the core of its operations and strategy to cultivate and nurture a sustainability mindset among its people and partners. We have integrated sustainability into the core of our operations and strategy to cultivate and nurture a sustainability mindset among our people and partners

SDG

In line with Seagulls's ambition to positively contribute to a sustainable future and make a difference, we endorse the Sustainable Development Goals (SDGs) of the United Nations. We are members of Global Compact Network Singapore and support their sustainability agenda.

STANDARDS AND FRAMEWORKS

All topics have been linked to Environmental, Social Governance (ESG) metrics as defined by the International Sustainability Standards Board (ISSB) and the Sustainability Accounting Standards Board (SASB) industry standards and other relevant standards such as the European Sustainability Reporting Standards (ESRS), the Global Reporting Initiative (GRI) and Singapore Stock Exchange (SGx)[1] .

FOCUS AREAS

For this initial report, we have captured the performance for the carbon emissions since 2023 and other material topics since 2024, the first 5 months. Furthermore, for each category actions and goals have been defined.

Our main focus has been to establish a baseline for our carbon emissions aligned with the Greenhouse Gas Protocol. The organizational boundaries for our carbon accounting involve the activities related to the joint operations in the Seagull owned facility in Singapore.

As a result of our Materiality Assessment and Stakeholder Engagement, we have identified 27 sustainability topics relevant to our industry and business of which 6 topics have been prioritized for 2024.

[1] See details Appendix 1

KPI'S

ENVIRONMENT	GHG Emissions in own operations - Scope 1 & 2
	Energy Management - own operations
SOCIAL	Workforce Health & Safety - own operations
	Workforce Health & Safety - upstream
GOVERNANCE	Corruption & Bribery - prevention and detection including training
	Corruption & Bribery - incidents

Methodology

At Seagull, we have adopted a stepwise and structured approach to sustainability. Guided by the global reporting standards and frameworks, we have laid the foundation and created our path toward more sustainable practices. Our methodology is performance-based and designed to measure, monitor, and manage sustainability information continuously.

MATERIALITY ASSESSMENT

Focusing our sustainability strategy by identifying and prioritizing materiality topics:
- Value Chain Mapping
- Stakeholder Engagement
- Impact, Risks & Opportunity Assessment

ORGANISATIONAL SETUP

Establishing Tools , Roles, and Responsibilities to measure and monitor carbon emissions and other prioritized ESG topics.

GOVERNANCE STRUCTURE

Implementing a Sustainability Governance Structure to oversee the progress, manage sustainability-related information, and align with overall business strategy.

INTERNAL DATA AUDIT

Internal verification of the sources and data captured for GHG accounting.

FINANCIAL ANALYSIS

Identifying the prioritized material topics that would impact the business, analyse the effects of these topics on the financials in the short-, medium-, and long-term.

ESG REPORT

Preparing our first ESG Performance Report that will act as a blue-print for its future sustainability reports.

Materiality Assessment

Regional and international standards

Our materiality assessment is based on internationally recognized standards and frameworks including mandatory reporting guidelines and frameworks for listed companies, voluntary reporting frameworks and standards, guidelines for materiality assessment, impact, risk and opportunity assessment, and stakeholder engagement and exposure drafts for a baseline set of metrics recommended for SMEs. These sources are crucial for establishing a common understanding of reporting principles to provide reliable sustainability information that can be compared with other companies and over time.

SOURCES

1. European Sustainability Reporting Standards (ESRS) – General Requirements ESRS 1 and General Disclosures ESRS 2, published in July 2023.
2. Materiality Assessment Implementation Guidance" developed by European Sustainability Reporting Standards (ESRS).
3. International Financial Reporting Standards (IFRS) – International Sustainability Standards Board (ISSB) S1 – General Requirements for Disclosure of Sustainability-related Financial Information & S2 - Climate-related Disclosures, published in June 2023.
4. Global Reporting Initiative (GRI) for the process, topics, and metrics.
5. Sustainability Accounting Standards Board (SASB) for industry-specific metrics.
6. Singapore Exchange Sustainability Metrics (SGx)
7. Exposure Draft "Voluntary standard for non-listed small- and medium-sized undertakings (VSME ED)" by EFRAG for baseline set metrics recommended for SMEs
8. White Paper on Project Savannah: Common ESG Metrics for Generating Digital Sustainability Credentials for MSMEs by MAS, UNDP and GLEIF) for a baseline set of metrics recommended for SMEs

Materiality Assessment

Aligned with the requirements from internationally recognized reporting frameworks and standards [1], we have carefully identified and analyzed what materiality topics to focus on progressively from 2024 to 2026. In this process, the Value Chain Assessment, IRO (Impact, Risk and Opportunity Assessment and Stakeholder Engagement are instrumental.

Value Chain Assessment

In a thorough review of our Business Model and Value Chain, we identified the key activities and partnerships that will impact our ability to create sustainable value.

IRO Assessment

We have identified and evaluated the impact that our business activities have on the environment and society and we have estimated sustainability-related risks and opportunities that may trigger material financial effects on the business. The IROs have been classified as per TCFD for physical risk, transition risks, and opportunities [2]

Stakeholder Engagement

Three key stakeholder categories were identified - Customers, Suppliers, and Associations. Their input and perceived importance for specific sustainability matters have been captured through interviews and questionnaires which were considered for the materiality assessment.

SUSTAINABILITY MATRIX 2024

High

Importance to external stakeholders

Airquality

Waste management

Health & Safety

Energy management

Ecological impact

Water Management

Business Ethics

Scope 1 & 2 Eissions

Corruption & Bribery

Scope 3 Eissions

Privacy

Low

High

Importance to Seagull

Environment   Social   Governance

Organizational Setup

EMBEDDING REPORTING PRINCIPLES

A systematic approach to capturing and measuring ESG data over time has been adopted in our organization. As a partner in the global supply chain, we understand the importance of complying with the reporting principles outlined in the Greenhouse Gas Protocol and other global reporting frameworks. This ensures we meet stakeholders' needs for transparent, verifiable, relevant, reliable, complete, consistent, accurate, and comparable sustainability information.

SUSTAINABILITY ACCOUNTING

Clear roles and responsibilities for Data Owners, Process Owners, and the Sustainability Officer have been defined and documented to ensure efficient periodic sustainability accounting. The CERT tool provided by the UN Global Compact Network Singapore supports our team in carbon accounting, while other internal tools address additional material topics. The information captured in these tools serves as the foundation for decision-making, continuous improvement, and external reporting.

CARBON ACCOUNTING

We have successfully participated in LowCarbonSG program 2024. This achievement confirms our commitment to decarbonization.

LowCarbonSG, led by Carbon Pricing Leadership Coalition (CPLC) Singapore, is the decarbonisation arm of the UN Global Compact Network Singapore (GCNS), and supported by the National Environment Agency (NEA) and Enterprise Singapore (ESG)

https://unglobalcompact.sg/lowcarbonsg

Governance Structure

To ensure an adequate oversight of the sustainability strategy, we have established a Governance Structure aligned with the requirements outlined in a) European Sustainability Reporting Standards (ESRS) b) International Sustainability Standards Board (ISSB) and c) Taskforce for Climate-related Disclosures (TCFD), Clear roles and responsibilities have been defined for the following key functions

SUSTAINABILITY TASK FORCE consisting of key personnel from various departments, the team is responsible for periodically monitoring the sustainability performance, contributing with ESG information and interpretation of the result, driving sustainable business development by suggesting improvement projects, and staying abreast of industry best practices, new laws, and regulations.

SUSTAINABILITY OFFICER overseeing the activities of the Sustainability task force, regularly updating the Management Team on sustainability performance, challenges, and opportunities, and developing and implementing sustainability strategies aligned with the company's overall mission and vision.

MANAGEMENT REPRESENTATIVE, the Sustainability taskforce team shall coordinate with management representative at Seagull for the scope of organizational health and safety and ISO specific information.

FUNCTIONAL GROUPS co-ordinating with the sustainability task force in the capacity for integrating purchasing, commercials, and operations to effectively embed sustainability into all aspects of the business.

FINANCE TEAM Sustainability Taskforce team shall coordinate with finance team to effectively support and enhance the company's sustainability efforts.

Environmental Performance

Climate change derived from CO_2 emissions is a risk to biodiversity and livelihoods and poses operational and commercial challenges to Seagull's business.

PERFORMANCE 2023

- Total Scope 1 emissions: 291 (t) CO_2-e
- Total Scope 2 emissions: 279 (t) CO_2-e
- Hotspots of total Scope 1 & 2: a) Purchased grid electricity - 49% b) Stationary combustion of gas/diesel - 29% c) mobile combustion from own fleet - 22%.
- All consumed energy comes from the grid.

PERFORMANCE JANUARY - MAY 2024

- Total Scope 1 emissions: 62 (t) CO_2-e
- Total Scope 2 emissions: 99 (t) CO_2-e
- Total energy consumed: 245 MWh

RELEVANT POLICIES

- All company-owned passanger vehicles, will be renewed to EV vehicles.
- Free charging will be offered to employees to incentivize private EV vehicles

KPI'S

1) Gross Scope 1 GHG emissions -Metric tonnes (t) CO_2-e

2) Gross Scope 2 GHG emissions -Metric tonnes (t) CO_2-e

3) Energy Management

a. Total energy consumed
b. Percentage grid electricity
c. Percentage renewable

LOOKING TO 2024-25

- We plan to install a 1.16 megawatt rooftop solar panel system, which is estimated to cover 100% of our energy consumption during daytime at the fabrication yard and machining shop in Tuas, Singapore. Furthermore, an estimated surplus corresponding to 65% of our produced solar energy will contribute to more available renewable energy.
- Continue to replace company-owned vehicles with EV cars at the end Certificate of Entitlement (COE).
- EV Chargers are currently installed for charging both employees and company cars. With the solar PV system in place, these will soon be transitioned to power from grid to solar power.
- Old air conditioning equipment will progressively be replaced with R32 type. Going from a centralized to a hybrid design will optimize air conditioning and reduce consumption.
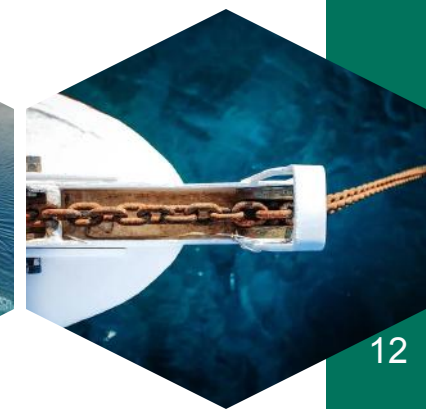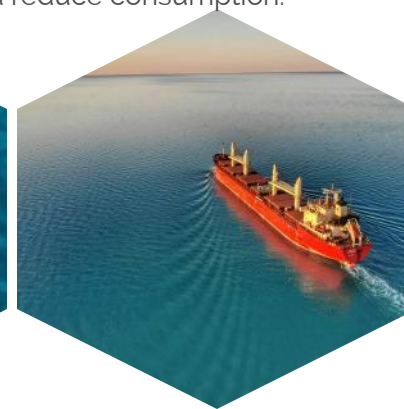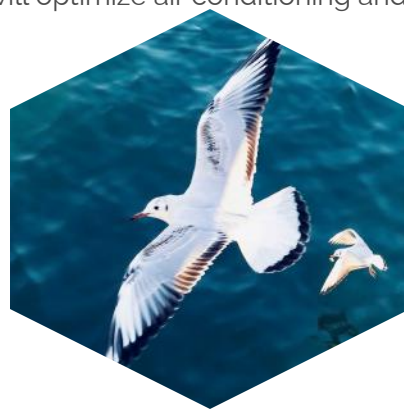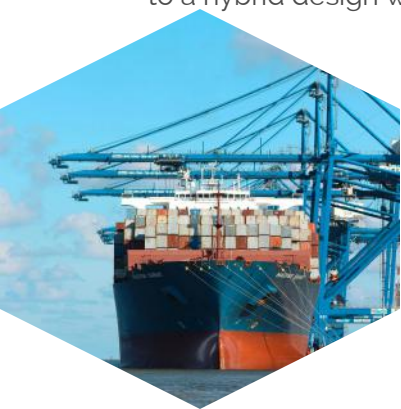
Social Performance

We support and respect the protection of internationally proclaimed human rights as stated in the UN Guiding Principles for Business and Human Rights

Our processes for health & safety are robust and based on the certifications ISO 9001, ISO 14001, ISO 45001 and BizSAFE Star.

PERFORMANCE JANUARY - MAY 2024

· No workforce Health & Safety in own operations or upstream have been registered in the period.

OPERATIONAL SAFETY

· We increased our monitoring frequency from weekly to daily inspections to promptly identify and address potential hazards.
· Implemented a robust maintenance schedule to ensure all equipment and facilities are in optimal condition.
· Conducted regular toolbox meetings to foster a culture of safety awareness and communication among employees.
· Conducted regular internal audits to ensure compliance with ISO standards and identify areas for improvement
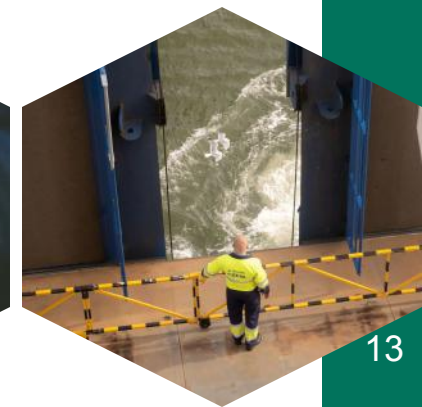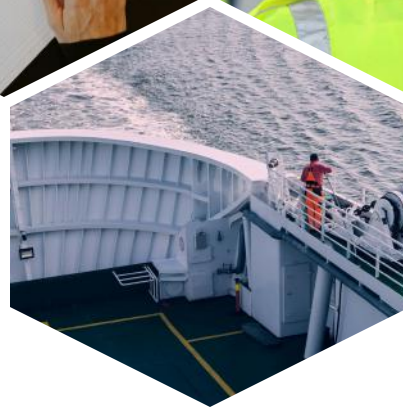
KPI'S

1) Workforce Health & Safety - own operations

a. Total recordable incident rate (TRIR)
b. Fatality rate
c. Near miss frequency rate (NMFR)
d. Lost time incident rate (LTIR)

2) Workforce Health & Safety - upstream

Same as above plus
e. Number of marine casualties.
f. Percentage classified as very serious
g. Number of Conditions of Class or Recommendations

Social Performance

SYSTEMS AND PROCEDURES

· Established a permit to work system to control high-risk activities.
· Implemented ongoing risk assessments and continuous improvement processes to identify and
  mitigate potential risks.
· Developed and enforced safe work procedures for all tasks and operations.

INITIATIVES AND HEALTH AND SAFETY PROGRAMS

· Improved our hazard and near miss reporting system by transitioning from a physical hazard
  observation card to a QR code-based system.
· Achieved 100% compliance with mandatory Workplace Safety and Health (WSH) training, ensuring
  all employees are knowledgeable in safety protocols.
· Implemented a comprehensive safety induction program for all visitors, workers, subcontractors,
  vendors, and stakeholders before they enter our premises, facilitated by a Visitor Management
  System.
· Introduced monthly safety awards to recognize and reward employees who demonstrate
  outstanding commitment to safety.
· Organized a heat stress awareness campaign to educate employees about the risks and
  prevention of heat-related illnesses

LOOKING TO 2024-25

As we expand our business, our highest priority is to
continue safeguarding our people through a robust system
of preventive measures, comprehensive training for new
employees, and regular on-the-job safety and health
training.
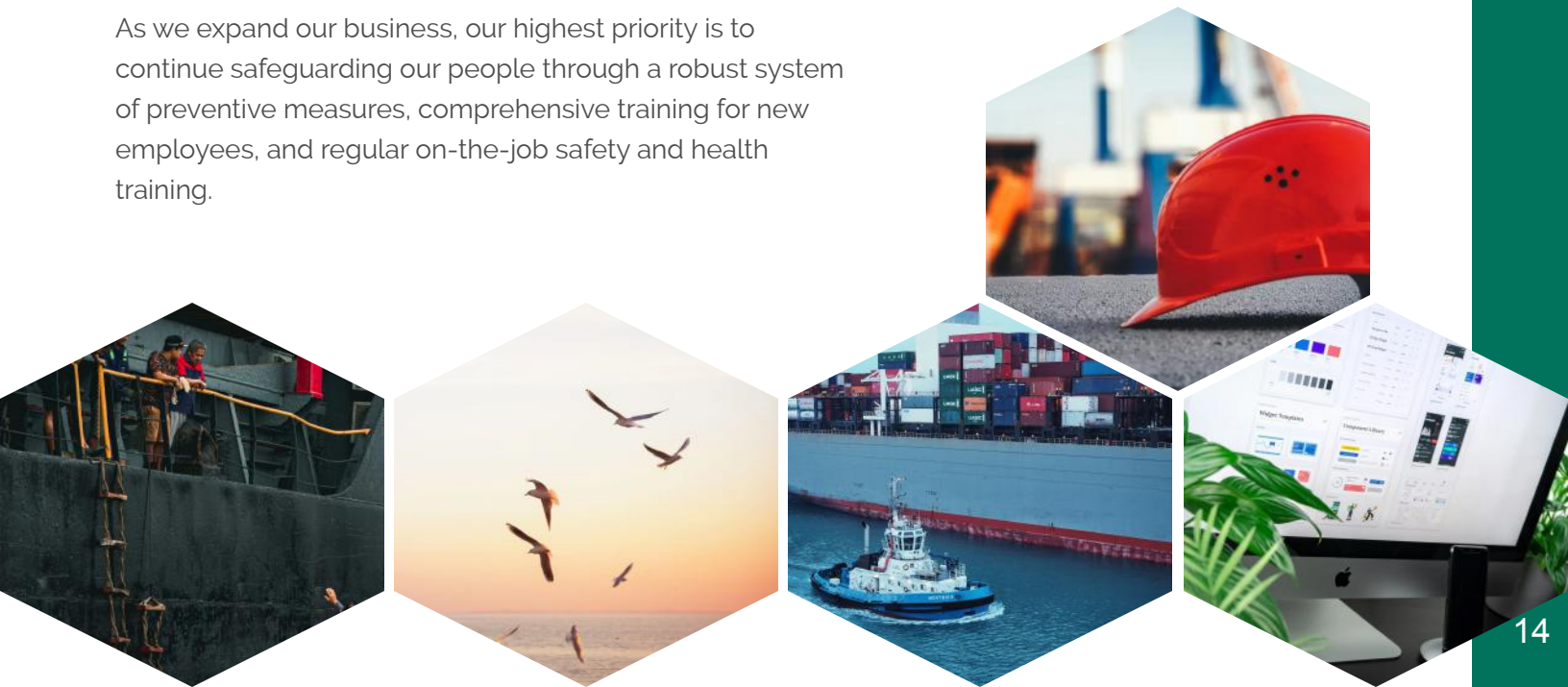
Governance

We have a well-established anti-corruption and anti-bribery policy covering general principles, applicable laws, policy for gifts, entertainment, charitable and political contributions, hiring decisions, training and certifications record keeping, and reporting of wrongdoings.

PERFORMANCE JANUARY - MAY 2024

- 10 trainings have been setup within the organization to address prevention and detection of corruption and bribery in the period.
- No incidents of corruption and bribery have been reported in the period.

LOOKING TO 2024-25

With an increasing international presence, we will consider business practices in the respective markets and provide regular training to avoid incidents related to corruption and bribery.

KPI'S

1) Number of Trainings setup within the organization to address prevention and detection of corruption and bribery

2) Corruption & Bribery: Number of incidents reported

Appendix 1

Applicable Disclosure Requirements

ESRS

Disclosure Requirements (DRs) and Application Requirements (ARs) from ESRS 2:

Basis of Preparation (BP)
- BP – 1: General basis of preparation of the sustainability statements
- BP – 2: Disclosures (Time horizons, Value chain estimation)

Governance (GOV)
- GOV – 1: The role of the administrative, management and supervisory bodies
- GOV – 2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Strategy, Business Model (SBM)
- SBM – 1: Strategy, business model and value chain,
- SBM – 2: Interests and views of stakeholders, and
- SBM – 3: Material impacts, risks and opportunities and their interaction with strategy and business model

Impacts, Risks, and Opportunities (IRO)
- IRO – 1: Identify and assess material impacts, risks, and opportunities.
- ESRS 1: paragraphs 46-57; ESRS 2, paragraphs 48-57, AR19, AR20, are used as points of reference.

Disclosure Content (DC) – Metrics (M)
- DC-M – Metrics in relation to material sustainability matters

Stakeholder Engagement:
ESRS 1, paragraphs 26 (a) and 28, 36 (c), 65 (b), 77; ESRS 2, 41-43, AR15, are used as point of reference for stakeholder engagement.

Appendix 1

Applicable Disclosure Requirements

IFRS

Disclosure requirements are aligned with core content requirements specified in the S1 standard as below:

- ◦ **Governance:** Governance process and internal control,
- ◦ **Strategy:** the approach to managing sustainability-related risks and opportunities
- ◦ **Risk Management:** identity, assess, and prioritise sustainability-related risks & opportunities
- ◦ **Metrics and Targets:** performance related to identified material topics

GREENHOUSE GAS PROTOCOL

The Carbon Accounting follows the guidance in the Greenhouse Gas Protocol for Scope 1 and Scope 2 emissions and the principles outlined in ISO 14064-1:2018. The emission factors provided by the CERT-tool are applicable to Singapore operations and assets which the company owns or manages, and which it has operational control over. They are based on IPCC Guidelines for National Greenhouse Gas Emissions and emission factors provided by local authorities.

SASB

The following disclosure topics and metrics from the SASB industry standards have been considered:

Marine transportation:
TR-MT-110a.1, TR-MT-110a.3, TR-MT-320a, TR-MT-320a, TR-MT-540a.1, TR-MT-540a.2

Industrial Machinery & Goods:
RT-IG-130a.1, RT-IG-320a

GLOBAL REPORTING INITIATIVE

The following disclosures from the GRI standards have been considered:

GRI 305-1 Direct (Scope 1) GHG emissions
GRI 305-2 Energy indirect (Scope 2) GHG emissions
GRI 302-1 Energy consumption within the organization
GRI 403-9 Work-related injuries
GRI 205-2 Communication and training about anti-corruption policies and procedures
GRI 205-3 Confirmed incidents of corruption and actions taken

Appendix 2

Materiality Topics and Metrics Financial Year 2024

We have identified 6 topics as the most material to prioritise for the business in the financial year 2024 to incorporate environmental, social, and governance metrics across its value chain. The selection of topics is presented below, followed by the corresponding metrics to be measured, monitored, and managed.

ENVIRONMENT TOPICS & METRICS

Value Chain Activity	ESG	Topic	I	R	O	Seagull Materiality	Stakeholder Priority	Seagull's Priority	Target Scope-FY
Operations	Environment	GHG Emissions	X	X		●	○	4-High	FY 2024
Operations	Environment	Energy Management	X	X	X	○	●	5-Very High	FY 2024

					Framework Coverage				
Topic	Metrics	Unit	ISSB	ESRS	VSME	SGx	GRI	Periodicity	
GHG Emissions - Operations									
	Gross Scope 1 GHG emissions	Metric tonnes (t) CO_2-e	TR-MT-110a.1	ESRS E1-6	VSME - B3	SGx-1	GRI 305-1	Monthly	
	Gross Scope 2 GHG emissions	Metric tonnes (t) CO_2-e		ESRS E1-6	VSME - B3	SGx-1	GRI 305-2	Monthly	
	(1) Total energy consumed, (2) percentage heavy fuel oil and (3) percentage renewable	MWh, Percentage (%)	TR-MT-110a.3		VSME - B3		GRI 302-1	Monthly	
Energy Management - Operations									
	(1) Total energy consumed (2) percentage grid electricity (3) percentage renewable	MWh, Percentage (%)	RT-IG-130a.1	ESRS E1-5	VSME - B3	SGx-2	GRI 302-1	Monthly	

SOCIAL TOPICS & METRICS

Value Chain Activity	ESG	Topic	I	R	O	Seagull Materiality	Stakeholder Priority	Seagull's Priority	Target Scope-FY
Upstream	Social	Health and safety	X	X		○	●	5-Very High	FY 2024
HR Management	Social	Workforce Health & Safety	X	X		○	●	5-Very High	FY 2024

					Framework Coverage				
Topic	Metrics	Unit	ISSB	ESRS	VSME	SGx	GRI	Periodicity	
Health and safety - Upstream									
	Working conditions - health and safety			ESRS - S2	VSME - B11				
	(1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract employees	Rate	RT-IG-320a			SGx-9	GRI 403-9	Monthly	
	Lost time incident rate (LTIR)	Rate	TR-MT-320a					Monthly	
Workforce Health & Safety - HR Management (own workforce)									
	Own workforce - Working conditions - health and safety			ESRS - S1	VSME - B9				
	(1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract employees	Rate	RT-IG-320a			SGx - 9	GRI 403-9	Monthly	
	Lost time incident rate (LTIR)	Rate	TR-MT-320a					Monthly	

Appendix 2
Materiality Topics and Metrics Financial Year 2024

GOVERNANCE TOPICS & METRICS

Value Chain Activity	ESG	Topic	I	R	O	Seagull Materiality	Stakeholder Priority	Seagull's Priority	Target Scope-FY
Infrastructure	Governance	Corruption & Bribery - Prevention and detection including training	X	X		🟡	🟡	5-Very High	FY 2024
Infrastructure	Governance	Corruption & Bribery - Incidents	X	X		🟡	🟡	5-Very High	FY 2024

Topic	Metrics	Unit	ISSB	ESRS	VSME	SGx	GRI	Periodicity
Corruption & Bribery - Prevention and detection including training								
	Number of Trainings setup within the organization to address prevention and detection of corruption and bribery	Number		ESRS - G1	VSME - B12	SGx - 12	GRI 205-1, GRI 205-2, GRI 205-3	Yearly
Corruption & Bribery - Incidents								
	Number of incidents reported	Number		ESRS - G1	VSME - B12	SGx - 12	GRI 205-1, GRI 205-2, GRI 205-3	Yearly

Framework Coverage spans ISSB, ESRS, VSME, SGx, GRI columns.

LEGEND

🔴 High priority

🟡 Medium priority

🟢 Low priority